

From: [Siu, Jennifer](#)
To: [Bowyer, Dale@Waterboards](#); [Hart, Kathryn@Waterboards](#); [Wines, Brian@Waterboards](#); [Lichten, Keith@Waterboards](#); [Morrison, Elizabeth@Waterboards](#)
Cc: [Moffatt, Brett](#); [Leidy, Robert](#)
Subject: RE: Request for Permit Documentation
Date: Thursday, October 15, 2015 3:40:00 PM

Dale,

For this request, we are interested in the period of record since the Water Board began implementing 401 certification actions for the CWA. For instance, we understand that the USACE has been issuing O&M permits under 404 for the Cargill site at least since 1995, perhaps earlier. We assume the corollary process for 401 certification of these actions. We recently received a copy of the 401 certification for a 10yr cycle of maintenance activities and improvements (such as levee repair) for all Cargill Systems in Alameda and San Mateo Counties (dated August 3, 2010) (Site No: 02-01-C1066, in association with ACOE No: 2009-00160S). Cargill's Redwood City Salt Plant was one of the sites covered by the permit. We do not have the previously issued 401 permit (Site No: 95-115, in association with ACOE No: 19009599), nor any others that may exist. We also see that the 2010 cert references an effort to update the USFWS BO from the existing 1995 one – this would be another kind of related document we are looking for.

Regarding the other sites, I am again assuming 401 permits from the Board for facility construction and perhaps O&M.

Does this help?

Jennifer

Jennifer Siu
Life Scientist, Wetlands Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3983
Siu.Jennifer@epa.gov

From: Bowyer, Dale@Waterboards [mailto:Dale.Bowyer@waterboards.ca.gov]
Sent: Thursday, October 15, 2015 2:33 PM
To: Siu, Jennifer <Siu.Jennifer@epa.gov>; Hart, Kathryn@Waterboards <Kathryn.Hart@waterboards.ca.gov>; Wines, Brian@Waterboards <Brian.Wines@waterboards.ca.gov>; Lichten, Keith@Waterboards <Keith.Lichten@waterboards.ca.gov>; Morrison, Elizabeth@Waterboards <Elizabeth.Morrison@waterboards.ca.gov>
Cc: Moffatt, Brett <Moffatt.Brett@epa.gov>; Leidy, Robert <Leidy.Robert@epa.gov>
Subject: RE: Request for Permit Documentation

Jennifer,

Could you be more specific about time frame, or date and specific work requiring permitting. Not sure exactly what "certification for Redwood City Plant" would be. Same goes for the other three. If we could get dates or date range, and as specific as possible about the work permitted. Thanks.

From: Siu, Jennifer [<mailto:Siu.Jennifer@epa.gov>]

Sent: Thursday, October 15, 2015 1:03 PM

To: Bowyer, Dale@Waterboards; Hart, Kathryn@Waterboards; Wines, Brian@Waterboards; Lichten, Keith@Waterboards; Morrison, Elizabeth@Waterboards

Cc: Moffatt, Brett; Leidy, Robert

Subject: RE: Request for Permit Documentation

Dale,

Thank you very much for your assistance on this. I think a broad search of the documents is appropriate. We would also like copies of any associated federal and state agency permits specifically referenced in your permit action for a project, as available. For instance, the original and revised USFWS and NMFS Biological Opinions associated with Cargill's 401 certification for the Redwood City Plant would be helpful to us.

Again, much thanks.

Jennifer

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Siu.Jennifer@epa.gov

From: Bowyer, Dale@Waterboards [<mailto:Dale.Bowyer@waterboards.ca.gov>]

Sent: Thursday, October 15, 2015 10:51 AM

To: Siu, Jennifer <Siu.Jennifer@epa.gov>; Hart, Kathryn@Waterboards <Kathryn.Hart@waterboards.ca.gov>; Wines, Brian@Waterboards <Brian.Wines@waterboards.ca.gov>; Lichten, Keith@Waterboards <Keith.Lichten@waterboards.ca.gov>; Morrison, Elizabeth@Waterboards <Elizabeth.Morrison@waterboards.ca.gov>

Cc: Moffatt, Brett <Moffatt.Brett@epa.gov>; Leidy, Robert <Leidy.Robert@epa.gov>

Subject: RE: Request for Permit Documentation

Importance: High

Jennifer,

We understand that this request relates to your efforts to determine the jurisdictional status of salt ponds, which is a very important issue for us, so we will see what we can find. You mention 401,

O&M, and NPDES documents. Is there any other elaboration on this that may help our search. I think we will err on the side of giving you almost everything we have for starters.

From: Siu, Jennifer [<mailto:Siu.Jennifer@epa.gov>]
Sent: Thursday, October 15, 2015 10:32 AM
To: Bowyer, Dale@Waterboards
Cc: Moffatt, Brett; Leidy, Robert
Subject: Request for Permit Documentation

Morning Dale,

EPA is looking into the permit history for several projects in Redwood City. We would like to request electronic and/or hard copies of any historic and current permit documentation from the Water Board related to the following projects:

- Westpoint Marina, 1529 Seaport Boulevard, Redwood City, 94063
- Cargill Redwood City Salt Plant, Redwood City
- Pacific Shore Center, 1700 Seaport Boulevard, Redwood City, 94063
- So Bay Salt Ponds Restoration Project Ravenswood Ponds Complex, Redwood City

Specifically, we are interested in any 401, O&M, and NPDES documents. I will coordinate with Lila Tang regarding the NPDES information. As I mentioned on the phone, EPA would like to minimize expenditure of your staff resources from this request and we would be happy to come to the RB offices to assist in the gathering.

Thank you,
Jennifer

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